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January 13, 2022

Hon. Judge Lorna G. Schofield Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

RE: Volman v. JOS Concept, LLC et al

CIVIL DOCKET FOR CASE #: 1:21-cv-09502-LGS

Dear Judge Schofield:

The undersigned represents Josef Volman, the plaintiff in the above-referenced matter. I write to respectfully request an adjournment of the January 19, 2022 Initial Pretrial Conference due to the defendants' default. This is plaintiff's first request for an adjournment of the Pretrial Conference.

The defendants were served through the Secretary of State on December 14<sup>th</sup>, 2021 and December 15<sup>th</sup>, 2021. To date, the defendants have not yet appeared, answered, or otherwise moved or communicated withmy office. The Department of State is currently experiencing delays due to the COVID-19 pandemic and plaintiff is therefore inclined to extend to defendants an additional 30 days to appear, however, plaintiff can commence default proceedings if that is the Court's preference.

Thank you for your time and consideration on this matter.

Application GRANTED. The initial pretrial conference scheduled for January 19, 2022, is adjourned to **February 23, 2022, at 4:20 p.m.** The parties shall file their joint letter and proposed case management plan by **February 16, 2022, at noon**. If Plaintiff is not in contact with Defendants at that time, Plaintiff shall file a request to adjourn the conference and propose a date for presenting a proposed order to show cause for default judgment and related

papers as required by the Court's Individual Rules.

Respectfully,

/S/ Jeremy Mark Ancelson

Dated: January 14, 2022 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE